

EXHIBIT A

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April 4, 2005

By Facsimile and First Class Mail

Erin K. Higgins, Esquire
Conn Kavanaugh Rosenthal Peisch & Ford, LLP
Ten Post Office Square
Boston, Massachusetts 02109

Re: Casas, Benjamin & White v. The Pointe Group, et al

Dear Erin:

I am very pleased that we have been able to agree upon deposition dates for John McCullough, Georgia Freid and me. I must, however, object to the requested production of documents in accordance with your subpoenas for all of us.

With respect to John McCullough and me, we have, in connection with your document request to The Pointe Group, produced all of the non-privileged documents in our respective possessions. Consequently, although there are no further documents to produce, for the sake of clarity I want to express my and John's objections to the production of documents pursuant to your subpoenas.

With respect to Georgia Freid, I must object to the production of documents pursuant to her subpoena on two grounds. First, she does not return from Florida until April 30, 2005 and, therefore, any production of documents would be onerous and burdensome. Secondly, except with respect to Request Number 16 (again, a literal reading of which would require her to produce every document she has with her name on it, regardless of relevance or time frame), she has no documents that would be responsive to the subpoena. In any event, her objection is noted.

This letter is, again, more formality than substance because you already have all of the documents available from John McCullough and me and Georgia Freid has no documents. To the extent that Georgia Fried has the authority to require The Pointe Group to produce documents, those documents have already been produced. To the extent that you seek documents not of The Pointe Group, her objection stands.

GORDON HALEY LLP

Erin K. Higgins, Esquire
March 24, 2005
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I look forward to seeing you at the end of this month and the first week in May to complete the scheduled depositions of John McCullough, Georgia Freid and me.

Sincerely,

Stephen F. Gordon / VSH

Stephen F. Gordon
SFG:VSH

cc: W. Scott O'Connell, Esquire (By Facsimile)
Todd B. Gordon, Esquire

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